POLICY AND PROCEDURES	DIVISION:	ADMINISTRATION
Oshawa Power & Utilities Corporation	REPORT TITLE:	PRIVACY OF PERSONAL INFORMATION
	POLICY #:	WEB SITE POLICY STATEMENT
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Policy

Oshawa Power and Utilities Corporation and its affiliates, here and after referred to as OPUC, is committed to keeping the personal information of its customers accurate, confidential, secure and private. Our Privacy Policy has been designed to inform employees, customers and subcontractors of our commitment and recognition to our obligation to meet the spirit and terms of the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

Our Privacy Policy describes the principles by which OPUC protects the privacy of personal information in its possession. It addresses the reasons why such information is collected, how it is used, how its confidentiality is protected and outlines the customer's rights in respect of this information. The Privacy of Personal Information Policy incorporates and expands the ten internationally accepted principles, as outlined below, for the protection of personal information, as set down by the Canadian Standards Association (CSA)

This Privacy Code does not apply to information about business customers who carry on business as corporations, partnerships or other forms of association. OPUC does, however, protect the confidentiality of such information in accordance with the law and our own policies.

Procedure

Personal Information Protection Principles

1. Accountability

OPUC is accountable for the protection of all personal information within the organization's possession or control, including any personal information that has been transferred to a third party for regulatory, legal or processing purposes. OPUC will require a comparable level of protection of this information from its third party relations. The Privacy Officer, has overall responsibility for protection of personal information and for OPUC's compliance with this Privacy Policy.

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2. Identifying Purposes

Personal information that OPUC collects from customers includes but is not limited to:

- the customer's name and address and other contact information, such as telephone numbers, email address
- the meter number
- facts about consumption of power, both historic and current
- information about a customer's transactions with us, such as account numbers, account balances, payment history
- credit and reference information, such as date of birth, employment information, drivers license, previous addresses, and general financial information
- medical information to be used in case of emergency power outages
- bank information for pre-authorized payments

When an individual applies for service, OPUC will make the individual aware of the purposes for which OPUC is requesting the personal information. If OPUC identifies other purposes for which the personal information may be used, it will seek the individual's consent prior to such use. Oshawa Power and Utilities will advise that it is the individual's right to refuse permission for OPUC to use personal information for any new purposes.

Additional purposes for collecting personal information may be identified to an individual before or at the time of collection. However, at a minimum OPUC will collect personal information for the following purposes:

- Billing and collection of payments for electric service
- Pre-authorized payment for services
- Priority restoration of electric service to the correct address and meter, as may be required by medical circumstances
- Energy sector legal, regulatory and settlement requirements

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3. Consent

OPUC will obtain consent before or when it collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly or implicitly. OPUC will collect, use or disclose personal information without an individual's consent only in limited circumstances as permitted by law. Subject to certain legal and contractual restrictions and reasonable notice, an individual can refuse or withdraw their consent to the collection, use or disclosure of personal information about them at any time. All existing customers will be informed as to the personal information that has been collected, the purpose for the collection and the procedures available for contacting OPUC with any inquiries. New customers will be provided with an explanation about the collection, use and disclosure of their personal information when requesting service.

4. Limiting Collection

OPUC limits the amount and type of personal information it collects to that which is necessary for the business of the utility. Each affiliate such as Oshawa PUC Networks Inc. will be responsible for its own collection, use and disclosure of information. Affiliates will not share confidential information relating to a consumer, retailer or generator without the consent of that consumer, retailer or generator. Personal information will be collected using procedures which are fair, transparent and lawful.

5. Limiting Use, Disclosure and Retention

OPUC will only use the personal information for the purpose for which it was collected as identified in principle #2, unless consent is given by the individual to use or disclose it for another purpose. OPUC will develop explicit retention periods for closed accounts (zero balance), after which the personal information will be destroyed or made anonymous. Under certain exceptional circumstances, OPUC may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

6. Accuracy

All personal information will be kept accurate, complete and up to date. Individuals may challenge the accuracy and completeness of personal information about them and have it amended, as appropriate.

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7. Safeguards

In executing its responsibilities with respect to the confidentiality of personal information, OPUC will employ a number of safeguards, appropriate to the sensitivity of the information, to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to offices, security clearances and limiting access on a "need to know" basis and use of passwords and encryption. Procedures for implementing these measures will be communicated to all employees and third parties to ensure compliance with this principle.

8. Openness

OPUC will make its policies and practices relating to the protection of personal information available to its customers. It will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via OPUC's web page and bill inserts. The information will be available in a format that is easy to understand.

9. Individual Access

Any customer of OPUC can have access to the personal information about them that OPUC has in its possession or control. Any customer may request that their personal information be amended for purposes of accuracy and completeness. Customers can make their requests via email <u>contactus@OPUC.on.ca</u> or in writing to

Privacy Officer, OPUC, 100 Simcoe St. S., Oshawa ON, L1H 7M7. Response to an individual's request will be made in a timely and efficient manner.

10. Challenging Compliance

Any customer of OPUC may challenge OPUC's compliance with this Privacy Policy by contacting OPUC directly. OPUC has policies and procedures to receive, investigate and respond to individuals' complaints and questions. If the customer is not satisfied with the way OPUC has responded to a complaint, the customer can contact the Privacy Commissioner of Canada.